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Attorneys for Plaintiff,
ALEX VILLANUEVA

**THE UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA

Plaintiff,

vs.

COUNTY OF LOS ANGELES,
COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT, LOS
ANGELES COUNTY BOARD OF
SUPERVISORS, COUNTY EQUITY
OVERSIGHT PANEL, LOS
ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL,
CONSTANCE KOMOROSKI,
MERCEDES CRUZ, ROBERTA
YANG, LAURA LECRIVAIN,
SERGIO V. ESCOBEDO, RON
KOPPERUD, ROBERT G. LUNA,
MAX-GUSTAF HUNTSMAN,
ESTHER LIM, and DOES 1 to 100,
inclusive,

Defendants.

Case No.: 2:24-cv-04979-SVW-JC

**[Assigned to Hon. Stephen V. Wilson, and
Magistrate Judge Jacqueline Chooljian]**

**JOINT STIPULATION TO STAY
ENFORCEMENT OF COSTS
PENDING APPEAL**

[Proposed] Order Filed Concurrently
herewith

Trial Date: Vacated
Action Filed: June 13, 2024

1 Plaintiff and Defendants (collectively referred to herein as the “Parties”) hereby
2 stipulate as follows:

3 **WHEREAS**, this Court granted Defendant’s Motion for Summary Judgment on
4 May 15, 2025;

5 **WHEREAS**, Plaintiff filed his notice of appeal on May 27, 2025;

6 **WHEREAS**, the Clerk of the Court taxed costs in favor of Defendants and
7 against Plaintiff in the amount of \$57,787.73 on August 1, 2025;

8 **WHEREAS**, Plaintiff and Defendant have met and conferred under Local Rule
9 7-3 regarding Plaintiff’s planned motion under Federal Rule of Appellate Procedure 8
10 and Federal Rule of Civil Procedure 62(b) and (d) to stay enforcement of the costs
11 award during the pendency of the appeal filed by Plaintiff.

12 **WHEREAS**, Defendants have agreed to stay enforcement of the costs award
13 during the pendency of the appeal filed by Plaintiff on condition that Plaintiff post a
14 security for the costs award.

15 **WHEREAS**, the Parties respectfully request that the Court enter the order
16 submitted concurrently with this stipulation.

17 **IT IS SO STIPULATED**

18 Dated: August 19, 2025

SHEGERIAN & ASSOCIATES, INC.

19
20 By: Alex DiBona

21 Alex DiBona, Esq.

22 Attorneys for Plaintiff
23 ALEX VILLANUEVA

24 Dated: August 19, 2025

MILLER BARONDESS

25
26 By: /s/ Jason Tokoro

27 Jason H. Tokoro, Esq.

28 Attorneys for Defendants
COUNTY OF LOS ANGELES

VILLANUEVA V. COUNTY OF LOS ANGELES, et al. USDC Case No. 2:24-cv-04979-SVW-JC

PROOF OF SERVICE
UNITED STATES DISTRICT COURT,
CENTRAL DISTRICT OF CALIFORNIA

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11520 San Vicente Boulevard, Los Angeles, California 90049.

On August 19, 2025, I served the foregoing document, described as “**JOINT STIPULATION TO STAY ENFORCEMENT OF COSTS PENDING APPEAL**” on all interested parties in this action as follows:


Louis R. Miller, Esq.
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Jason H. Tokoro, Esq.
jtokoro@millerbarondess.com
Steven G. Williamson, Esq.
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☐ **(BY MAIL)** As follows:

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 19, 2025, at Los Angeles, California.



Amelia Sanchez